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19 *Attorneys for the Reorganized Debtors*

20
21 **UNITED STATES BANKRUPTCY COURT**
22 **NORTHERN DISTRICT OF CALIFORNIA**
23 **SAN FRANCISCO DIVISION**

24
25 **In re:**

26 **PG&E CORPORATION,**

27 **- and -**

28 **PACIFIC GAS AND ELECTRIC**
COMPANY,

29 **Reorganized Debtors.**

30 □ Affects PG&E Corporation

31 □ Affects Pacific Gas and Electric Company

32 Affects both Debtors

33 * *All papers shall be filed in the Lead Case, No.*
34 *19-30088 (DM).*

35 Bankruptcy Case No. 19-30088 (DM)

36 Chapter 11

37 (Lead Case) (Jointly Administered)

38 **DECLARATION OF JANE KIM IN**
39 **SUPPORT OF REORGANIZED DEBTORS'**
40 **OPPOSITION TO MOTION FOR RELIEF**
41 **FROM ORDER OF SPIRO JANNINGS**

42 **Related to Docket Nos.: 11829 and 11871**

43 **Hearing Information:**

44 Date: March 2, 2022

45 Time: 10:00 a.m. (Pacific Time)

46 Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Jane Kim, pursuant to section 1746 of title 28 of the United States Code, hereby declare under
2 penalty of perjury that the following is true and correct to the best of my knowledge, information, and
3 belief:

4 1. I am a partner of Keller Benvenutti Kim LLP, counsel to PG&E Corporation (“**PG&E**
5 **Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors
6 (collectively, “**PG&E**” or the “**Reorganized Debtors**” in the above-captioned chapter 11 cases (the
7 “**Chapter 11 Cases**”). I submit this Declaration in support of the *Reorganized Debtors’ Opposition to*
8 *Motion for Relief from Order of Spiro Jannings* (the “**Opposition**”),¹ filed contemporaneously herewith.

9 2. Attached hereto as **Exhibit A** is a true and correct copy of the January 13, 2022 e-mail
10 exchange between Ankey Thomas, the Court’s judicial assistant, and Michael St. James, bankruptcy
11 counsel for Spiro Jannings, regarding the Reorganized Debtors’ Request for Order filed in connection
12 with the Claim Objection. As counsel for the Reorganized Debtors, I was copied on these e-mails.

13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
14 correct to the best of my knowledge, information, and belief. Executed this sixteenth day of February,
15 2022, in Millbrae, California.

16

17 /s/ *Jane Kim*
18 Jane Kim
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28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Opposition.